

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) William Smith

§

§ CRIMINAL COMPLAINT

§ CASE NUMBER: DR:21-M -00108(1)

§

§

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 14, 2021 in Maverick county, in the WESTERN DISTRICT OF TEXAS defendant(s) did, conspire with other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that such persons were aliens illegally present in the United States, a felony,

in violation of Title

**8**

United States Code, Section(s)

**1324(a)(1)(A)(v)(I)**

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts: "On January 14, 2021, William Smith a United States citizen was arrested near Eagle Pass, Texas for transporting nine illegal aliens further into the United States. The defendant was arrested while driving a blue F-250 pickup truck, bearing license plate MTT 9546. A Border Patrol Agent witnessed several subjects loading onto the defendant's vehicle in an area known for illegal crossings. Several subjects absconded from

**Continued on the attached sheet and made a part of hereof.**

Sworn to before me and subscribed in my presence,

01/20/2021  
File Date

VICTOR ROBERTO GARCIA  
UNITED STATES MAGISTRATE JUDGE

\_\_\_\_\_  
Signature of Complainant  
Robles, Jesus H.  
Border Patrol Agent

at DEL RIO, Texas  
City and State

\_\_\_\_\_  
Signature of Judicial Officer

**WESTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

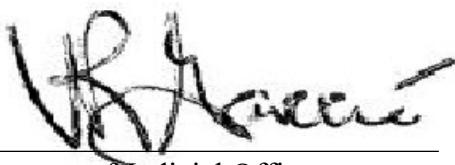
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**Continuation of Statement of Facts:**

the defendant's vehicle as the agent initiated a vehicle stop. The defendant attempted to abscond by driving away from the stop at a high rate of speed. The defendant and nine illegal aliens were arrested after several agents responded to the area. In a post Miranda interview the defendant admitted to conspiring with a subject known as "Veronica" to transport the illegal aliens for a payment of \$700 dollars per person."



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Signature of Judicial Officer



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Signature of Complainant